217/782-2113

"REVISED"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT[1]

PERMITTEE

Innophos, Inc.
Attn: Sean Schnepper
1101 Arnold Street
Chicago Heights, Illinois 60411

Application No.: 96030168 I.D. No.: 031045AAK
Applicant's Designation: CHIHGHTPLT Date Received: March 8, 1996
Operation of: Phosphate Chemical Manufacturing
Date Issued: November 19, 2002 Expiration Date[2]: November 19, 2007
Source Location: 1101 Arnold Street, Chicago Heights, Cook County
Responsible Official: Susan Turner, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a phosphate chemical manufacturing operation, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: June 16, 2004
Revision Date Issued: January 20, 2005
Purpose of Revision: Minor Modification

This minor modification includes a change of ownership and responsible official and the removal of a silica process which will continue to be owned and operated by the former owner of the site. That former owner (Rhodia, Inc.) has applied for a state operating permit for that equipment as the emissions are not significant enough for a second CAAPP permit. None of the actual processes have been modified and emissions from the units at this source are not higher than before. Thus the PM emissions (the only pollutant for which the source is significant) for this source are for less than the previous CAAPP permit since they do not include the silica process.

If you have any questions concerning this permit, please contact Dan Punzak at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:DGP:psj

cc: Illinois EPA, FOS, Region 1

[1] This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 – federal PSD and 35 IAC Part 203 – Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

[2] Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Innophos, Inc.
1101 Arnold Street
Chicago Heights, Illinois 60411
708/757-6111

I.D. No.: 031045AAK
Standard Industrial Classification: 2819, Industrial Inorganic Chemicals, Not Elsewhere Classified

1.2 Owner/Parent Company

Innophos, Inc.
CN5266
Princeton, New Jersey 08541

1.3 Operator

Innophos, Inc.
1101 Arnold Street
Chicago Heights, Illinois 60411

Sean Schnepper, Environmental Engineer
708/575-2559

1.4 General Source Description

The Innophos, Inc. manufacturing operation is located at 1101 Arnold Street in Chicago Heights. The source manufactures food grade inorganic chemicals. These materials are generally in solid (powder) form and thus dust collectors are used for control of emissions. In addition, there are several boilers on site to produce steam for process heat.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
DSP	Disodium Phosphate
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kW	kilowatts
lb	pound
mmBtu	Million British thermal units
MSP	Monosodium Phosphate
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SAP	Sodium Aluminum Phosphate
SAPP	Sodium Acid Pyrophosphate
SO_2	Sulfur Dioxide
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TSP	Trisodium Phosphate
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

WAPP Evaporator

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

Compliance with this requirement is considered to be assured by the inherent nature of the inorganic chemical operations at this source, as demonstrated by historical operation.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Specialty Mixing		Dec., 1972	
1 (P-4)	Mixer, Hopper and Two Bagging Stations		Dust Collector (C-5)
1 (P-4a)	Specialty Mill		Dust Collector (C-3)
Dicalcium Phosphate			
2 (P-7)	Lime Slaking Tank	Nov., 1972	Scrubber (C-7)
	Charge Tanks (Reactors)		(Closed System)
3 (P-5)	Rotary Dryer Firing Rate: 3.8 mmBtu/hr	Nov., 1972	Dust Collector (C-6)
4 (P-12)	Cyclone and Classifier	Nov., 1972	Dust Collector (C-13)
5 (P-6)	#1 Mill	1988	Dust Collector (C-8)
6 (P-87)	#1 Mill Dump Station	1992	Dust Collector (C-75)
7 (P-8)	Mix System and Discharge Hopper	1988	Dust Collector (C-9)
8 (P-11)	#2 Kiln Mill Firing Rate: 1.7 mmBtu/hr	1988	Dust Collector (C-12)
9 (P-10)	#3 Kiln Mill Firing Rate: 0.75 mmBtu/hr	Nov., 1972	Dust Collector (C-11)
10 (P-48)	Ditab Packaging Hooper	Nov., 1972	Dust Collector (C-52)
11 (P-86)	Redissolve Tanks and Dump Station	1992	Dust Collector (C-74)
12 (P-9)	Packaging Feed Hooper and Pneumatic Conveyor	Nov., 1972	Dust Collector (C-10)
13 (P-81)	Cd Packaging North Product Hopper	1989	Dust Collector (C-70)
14 (P-80)	Cd Packaging South Product Hopper	1989	Dust Collector (C-69)
15 (P-82)	CD-DF Rail Car Loading	1989	Dust Collector (C-71)
16 (P-88)	Calciner Firing Rate: 0.75 mmBtu/hr	1993	Dust Collector (C-76)
17 (P-89)	A-Tab Air Separator	1993	Dust Collector (C-77 and C-79)
18 (P-90)	A-Tab Mill	1993	Dust Collector (C-78 and C-79)
19 (P-91)	A-Tab Packaging	1993	Dust Collector (C-79)
20 (P-111)	Lime System	1972	Dust Collector (C-103)
Sodium Acid Pyrophosphate (SAPP)		Nov., 1972	
21 (P-19)	Mixer, Blender		Dust Collector (C-23)

Emission Unit	Description	Date Constructed	Emission Control Equipment
22 (P-20a)	Dryer Firing Rate 1.25 mmBtu/hr		Dust Collector (C-23)
22 (P-20b)	Converter/Stabilizer Firing Rate: 3.5 mmBtu/hr		Dust Collector (C-23)
22 (P-20c)	Mill		Cyclone and Dust Collector (C-22 and C-23)
23 (P-21)	Reformer Firing Rate 3.2 mmBtu/hr		Cyclone and Dust Collector (C-24 and C-25)
24 (P-22)	Mixer		Dust Collector (C-26)
25 (P-112)	Loss-in-Weight Feeder	Aug., 2001	None
Kasal (SAP, Sodium Aluminum Phosphate)		Dec., 1972	
26 (P-24)	Dump and Weigh Hopper		Dust Collector (C-29)
27 (P-27)	Batch Reactors, #1, 2 and 3		ME Wet Scrubber (C-33)
28 (P-25)	Kneadermaster Firing Rate: 1.2 mmBtu/hr		Dust Collector (C-30)
29 (P-26)	Kiln Mill Firing Rate: 0.85 mmBtu/hr		Cyclone and Dust Collector (C-31 and C-32)
30	Packaging		Dust Collector (C-32)
Trisodium Phosphate (TSP)		Dec., 1972	
31 (P-28)	Mixer		ME Wet Scrubber (C-34)
32 (P-29)	Blender		ME Wet Scrubber (C-35)
33 (P-30)	Dryer Firing Rate: 2.6 mmBtu/hr		Centrifugal Collector and Dust Collector (C-36 and C-37)
34	Packaging		Dust Collector (C-37)
Diliquor		Dec., 1972	
35 (P-38)	Soda Ash Unloading		Dust Collector (C-44)
36 (P-36)	Sodium Phosphate Rework Hopper		Dust Collector (C-42)
37 (P-37)	Mixer		ME Wet Scrubber (C-43)
Vacuum Crystallizer		1973	
38 (P-41)	Evaporator w/ 2-State Ejector and Intercondenser		Vapor Recovery (C-46)
39 (P-42)	Dryer Firing Rate: 0.6 mmBtu/hr		Dust Collector (C-47)

Emission Unit	Description	Date Constructed	Emission Control Equipment
40 (P-43)	Mill		Dust Collector (C-49)
41	Granular Packaging		Dust Collector (C-47)
42	Powder Packaging		Dust Collector (C-49)
Trimagnesium Phosphate		1975	
43 (P-44)	Dryer		Dust Collector (C-50)
44 (P-45)	Mill		Dust Collector (C-51)
45 (P-46)	Surge Bin		None
46 (P-47)	Packaging		Dust Collector (C-51)
Tricalcium Phosphate		1975	
47 (P-69)	Pug Mill and Dryer Firing Rate: 13.6 mmBtu/hr		Dust Collector (C-99)
48 (P-70a)	East Shift, Bin 501A		Dust Collector (C-100a)
49 (P-70b)	West Shift, Bin 501B		Dust Collector (C-100b)
50 (P-71)	Product Bin 502C		Dust Collector (C-101)
51 (P-72)	Product Bins 502A and 502B		Dust Collector (C-102)
52 (P-74)	Rework Station		Dust Collector (C-65)
53 (P-75)	Nuisance Dust Collection		Dust Collector (C-66)
54 (P-76)	Trical/Tri Tab Manufacturing		Dust Collector (C-67)
55 (P-83)	Bulk Loading and Packaging		Dust Collector (C-101)
Sodium Phosphate Redissolve		1986	
56 (P-79)	Redissolve Tank (8,800 Gallons)		HE Wet Scrubber (C-68)
Avgard		1994	
57 (P-110)	Four Premixers		Scrubber (C-98)
58 (P-110)	Blender		Cyclone and Scrubber (C-98A and C-98)
59 (P-109)	Dryer Firing Rate: 4.0 mmBtu/hr		Cyclone and Dust Collector (C-97A and C-97)
60 (P109A)	Bucket Elevator/Bagging System		Dust Collector (C-97)

Emission Unit	Description	Date Constructed	Emission Control Equipment
Boilers			
61 (P-49a)	Boiler No. 1, Natural Gas Only. Low NO_x Burners. Firing Rate: 123.9 mmBtu/hr	1999	None
62 (P-77)	Boiler No. 2, Natural Gas Only. Firing Rate: 52.6 mmBtu/hr	1981	None
63 (P-78)	Boiler No. 3, Natural Gas Only. Firing Rate: 38.8 mmBtu/hr	1981	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of PM emissions.

5.2 Applicable Regulations

5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Fugitive Particulate Matter Operating Program

a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)].

b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils,

or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.2.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.5 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.6 Future Regulations

a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall

certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.7 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If the source is required to have an episode action plan pursuant to 35 IAC 244.142 and change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.

d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

i. Illinois EPA, Compliance Section; and

ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or

iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.8 CAM Plan

This stationary source may have pollutant-specific emissions units that are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels. At the time of renewal the Permittee has the option to demonstrate that it does not have potential pre-control device emissions of an applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to any subpart of 40 CFR Part 63, because the source is not a major source of HAPs. None of the current MACT standards would apply to this source even if it were major for HAPs

5.3.2 This permit is issued based on the source not being subject to 35 IAC Part 218, Subparts PP, RR or TT because VOM emissions from the source do not exceed 25 tons/yr.

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	4.26
Sulfur Dioxide (SO_2)	0.47
Particulate Matter (PM)	138.6
Nitrogen Oxides (NO_x)	49.0
HAP, not included in VOM or PM	-----
Total	192.3

5.5.2 Emissions of Hazardous Air Pollutants

This permit is issued based on the emissions of HAPs as listed in Section 112(b) of the CAA not being equal to or exceeding 10 tons per year of a single HAP or 25 tons per year of any combination of such HAPs, so that this source is considered a minor source for HAPs. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Records for VOM and HAP Emissions

The Permittee shall maintain records to verify that the source is not a major source of HAP emissions.

5.6.3 Records for Operating Scenarios

N/A

5.6.6 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

b. The total annual emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

c. If annual emissions for the previous year of each individual HAP are below 5 tons and total HAPs below 12 tons, then monthly records are not required in the current year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 EMISSIONS REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.2 Applicability

This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 IAC Part 205, pursuant to 35 IAC 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.

6.3 Recordkeeping and Reporting

a. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:

i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 5 and 7 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period;

ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 5 and 7 of this permit; and

iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.

b. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit: Inorganic Chemical Processes
Control: Dust Collectors

7.1.1 Description

The applicable emission unit processes (as described in Condition 7.1.2) are included in this section as they are subject to the same regulations. A brief description of each process listed in Sections 7.1.2 is given below.

In most operations the chemical reaction occurs in a solution and there are no emissions. The emissions are PM from drying the product and handling of the product such as classifying the product by size, milling it, conveying it and finally bagging it.

Specialty Mixing – Mixing and bagging of materials produced in the other processes.

Dicalcium Phosphate – Lime slurry and phosphoric acid are reacted in "wringers" and the product goes through multiple steps of drying, milling, calcining, classifying and packaging with numerous dust collectors as control devices.

Sodium Acid Pyrophosphate (SAPP) – A mixture blend of phosphoric acid and soda ash.

Sodium Aluminum Phosphate (Kasal or SAP) – Aluminum is reacted with phosphoric acid and then mixed with sodium hydroxide.

Trisodium Phosphate (TSP) – Soda ash and phosphoric acid are mixed and blended to form the product, which is then dried, milled and packaged. Mosodium phosphate (MSP) may also be made.

Diliquor – An intermediate phosphate then used to make other products.

Vacuum Crystallizer – Crystals (disodium phosphate) from the diliquor are formed and then separated in a centrifuge, dried, sized/milled and packaged.

Trimagnesium Phosphate – Phosphoric acid is reacted with magnesium hydroxide, then filtered, dried, milled and packaged. The reaction is a weak acid/base reaction in an aqueous medium and the reactors (called charge tanks) are not considered to be emission units.

Tricalcium Phosphate – Phosphoric acid is reacted with slaked lime and then filtered, milled, dried and packaged. The units for reacting/mixing and filtering do not emit any pollutants.

Sodium Phosphate Redissolve – Reworked sodium phosphate is redissolved and used in other processes.

Avgard Process – Avgard is trisodium phosphate dodecahydrate produced by reacting soda ash, phosphoric acid and caustic soda (diliquor). The product is dried, sized and packaged.

Firing rates of dryers and kilns are listed here because the units use direct heat and thus those under 2.5 mmBtu/hr do not qualify as fuel combustion units or direct combustion units used for comfort heating as part of the insignificant units list in Condition 3.1.3.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Specialty Mixing		
1 (P-4)	Mixer, Hopper and Two Bagging Stations	Filter (C-5)
1 (P-4b)	Specialty Mill	Dust Collector (C-3)
Dicalcium Phosphate		
2 (P-7)	Lime Slaking Tank	Scrubber (C-7)
	Charge Tanks (Reactors)	(Closed System)
3 (P-5)	Rotary Dryer Firing Rate: 3.8 mmBtu/hr	Dust Collector (C-6)
4 (P-12)	Cyclone and Classifier	Dust Collector (C-13)
5 (P-6)	#1 Mill	Dust Collector (C-8)
6 (P-87)	#1 Mill Dump Station	Dust Collector (C-75)
7 (P-8)	#1 Cyclone and Silo, Vented Through P-8 Mix System, Discharge Hopper	Dust Collector (C-9)
8 (P-11)	#2 Kiln Mill Firing Rate: 1.7 mmBtu/hr	Dust Collector (C-12)
9 (P-10)	#3 Kiln Mill Firing Rate: 3.0 mmBtu/hr	Dust Collector (C-11)
10 (P-48)	Ditab Packaging Hooper	Dust Collector (C-52)
11 (P-86)	Redissolve Tanks and Dump Station	Dust Collector (C-74)
12 (P-9)	Packaging Feed Hooper and Pneumatic Conveyor	Dust Collector (C-10)
13 (P-81)	Cd Packaging North Product Hopper	Dust Collector (C-70)
14 (P-80)	Cd Packaging South Product Hopper	Dust Collector (C-69)

Emission Unit	Description	Emission Control Equipment
15 (P-82)	CD-DF Rail Car Loading	Dust Collector (C-71)
16 (P-88)	Calciner Firing Rate: 0.75 mmBtu/hr	Dust Collector (C-76)
17 (P-89)	A-Tab Air Separator	Dust Collector (C-77 and C-79)
18 (P-90)	A-Tab Mill	Dust Collector (C-78 and C-79)
19 (P-91)	A-Tab Packaging	Dust Collector (C-79)
Sodium Acid Pyrophosphate (SAPP)		
20 (P-111)	Lime System	Dust Collector (C-103)
21 (P-19)	Mixer, Blender	Dust Collector (C-23)
22 (P-20a)	Dryer Firing Rate: 1.25 mmBtu/hr	Dust Collector (C-23)
22 (P-20b)	Converter/Stabilizer Firing Rate: 3.5 mmBtu/hr	Dust Collector (C-23)
22 (P-20c)	Mill	Cyclone and Dust Collector (C-22 and C-23)
23 (P-21)	Reformer Firing Rate: 3.2 mmBtu/hr	Cyclone and Dust Collector (C-24 and C-25)
24 (P-22)	Mixer	Dust Collector (C-26)
25 (P-112)	Loss-in-Weight Feeder	None
Kasal (SAP, Sodium Aluminum Phosphate)		
26 (P-24)	Dump and Weigh Hopper	Dust Collector (C-29)
27 (P-27)	Batch Reactors, #1, 2 and 3	ME Wet Scrubber (C-33)
28 (P-25)	Kneadermaster Firing Rate: 1.2 mmBtu/hr	Dust Collector (C-30)
29 (P-26)	Kiln Mill Firing Rate: 0.85 mmBtu/hr	Cyclone and Dust Collector (C-31 and C-32)
30	Packaging	Dust Collector (C-32)
Trisodium Phosphate (TSP)		
31 (P-28)	Mixer	ME Wet Scrubber (C-34)
32 (P-29)	Blender	ME Wet Scrubber (C-35)
33 (P-30)	Dryer	Centrifugal Collector and Dust Collector (C-36 and C-37)

Emission Unit	Description	Emission Control Equipment
34	Packaging	Dust Collector (C-37)
Diliquor		
35 (P-38)	Soda Ash Unloading	Dust Collector (C-44)
36 (P-36)	Sodium Phosphate Rework Hopper	Dust Collector (C-42)
37 (P-37)	Mixer	ME Wet Scrubber (C-42)
Vacuum Crystallizer		
38 (P-41)	Evaporator w/ 2-State Ejector and Intercondenser	Vapor Recovery (C-46)
39 (P-42)	Dryer Firing Rate: 0.6 mmBtu/hr	Dust Collector (C-47)
40 (P-43)	Mill	Dust Collector (C-49)
41	Granular Packaging	Dust Collector (C-47)
42	Powder Packaging	Dust Collector (C-49)
Trimagnesium Phosphate		
43 (P-44)	Dryer Firing Rate: 2.0 mmBtu/hr	Dust Collector (C-50)
44 (P-45)	Mill	Dust Collector (C-51)
45 (P-46)	Surge Bin	None
46 (P-47)	Packaging	Dust Collector (C-51)
Tricalcium Phosphate		
47 (P-69)	Pug Mill and Dryer Firing Rate: 13.6 mmBtu/hr	Dust Collector (C-99)
48 (P-70a)	East Shift, Bin 501A	Dust Collector (C-100a)
49 (P-70b)	West Shift, Bin 501B	Dust Collector (C-100b)
50 (P-71)	Product Bin 502C	Dust Collector (C-101)
51 (P-72)	Product Bins 502A and 502B	Dust Collector (C-102)
52 (P-75)	Rework Station	Dust Collector (C-65)
53 (P-74)	Nuisance Dust Collection	Dust Collector (C-66)
54 (P-76)	Trical/Tri Tab Manufacturing	Dust Collector (C-67)
55 (P-83)	Bulk Loading and Packaging	Dust Collector (C-101)

Emission Unit	Description	Emission Control Equipment
Sodium Phosphate Redissolve		
56 (P-79)	Redissolve Tank (8,800 Gallons)	HE Wet Scrubber (C-68)
Avgard		
57 (P-110)	Four Premixers	Scrubber (C-98)
58 (P-110)	Blender	Cyclone and Scrubber (C-98A and C-98)
59 (P-109)	Dryer Firing Rate: 4.0 mmBtu/hr	Cyclone and Dust Collector (C-97A and C-97)
60 (P109A)	Bucket Elevator/Bagging System	Dust Collector (C-97)

7.1.3 Applicability Provisions and Applicable Regulations

a. The "affected chemical processes" for the purpose of these unit-specific conditions, are operations for producing inorganic chemicals and identified in Condition 7.1.2.

b. Each affected chemical process is subject to the emission limits identified in Condition 5.2.2.

c. Each chemical process is subject to 35 IAC 212.321(b)(1). The formula for calculating allowable is in Attachment 1.

7.1.4 Non-Applicability of Regulations of Concern

a. This permit is issued based on the affected dryers not being subject to the New Source Performance Standards (NSPS) for dryers in mineral industries, 40 CFR Part 60, Subpart UUU, because the affected chemicals being dried are not on the list of minerals in Section 60.731 except that trimagnesium phosphate is a magnesium compound, but the dryer was constructed in 1975, before the applicable date of April 23, 1986 and has not been modified.

b. This permit is issued based on the affected chemical manufacturing process not being subject to the New Source Performance Standards (NSPS) for nonmetallic mineral processing plants, 40 CFR Part 60, Subpart OOO, because the list of affected minerals in § 60.671 does not include any minerals being processed except sodium compounds, and the sodium compounds being processed only have equipment constructed prior to the applicable date of August 31, 1983 and has not been modified.

c. This permit is issued based on the affected chemical manufacturing processes not being subject to the New Source Performance Standards (NSPS) for reactor processes (Subpart RRR) in the synthetic organic chemical manufacturing industry because the reactors produce inorganic chemicals exclusively and not organic chemicals.

d. This permit is issued based on the affected chemical processes not being subject to 35 IAC 218, because the affected processes do not emit VOM.

7.1.5 Control Requirements, Production Limits and Work Practices

The Permittee shall operate in accordance with the following requirements pursuant to Section 39.5(7)(a) of the Act:

a. All dust collectors, filters, cyclones and scrubbers shall be operated in accordance with manufacturers recommendations and to reduce emissions of PM to comply with Condition 7.1.3(c) and 7.1.6.

b. An adequate supply of filters or bags shall be kept at the source to replace a unit that is not operating properly to reduce emissions.

7.1.6 Emission Limitations

The Permittee shall operate in accordance with the following requirements pursuant to Section 39.5(7)(a) of the Act:

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, specific affected processes are subject to the following:

Emissions from the affected processes shall not exceed the following limits:

	PM Emissions (Ton/Month)	(Ton/Year)
Avgard D.C. C-97	0.65[a]	7.51
Avgard Scrubber C-98	0.30[a]	3.42

[a] Average of the previous 12 months of data.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations contain revisions to previously issued Permit 94040134 for the avgard process. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements

from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hourly limits in the construction permits were changed to monthly so hourly records do not have to be kept [T1R].

7.1.7 Testing Requirements

Upon request by the Illinois EPA, any of the vents shall be tested to determine compliance with Condition 7.1.3(c) or 7.1.6.

7.1.8 Monitoring Requirements

The Permittee shall operate in accordance with the following requirements pursuant to Section 39.5(7)(b) and (d) of the Act:

A weekly observation of all stack shall be made to determine if opacity is within normal operating range.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected chemical processes to demonstrate compliance with Conditions 5.5.1, 7.1.5, 7.1.6 and 7.1.8, pursuant to Section 39.5(7)(b) of the Act:

a. Weekly stack observations;

b. PM emissions from dust collector and scrubber in avgard process (ton/mo); and

c. PM emissions from all units combined (ton/yr).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected chemical process with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. Emissions exceeding allowable of Condition 7.1.3(c) or 7.1.6.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

a. Compliance with emission limits in Conditions 7.1.3(c) and 7.1.6 shall be based on the recordkeeping and reporting requirements of Conditions 7.1.9 and 7.1.10, the monitoring requirements of Condition 7.1.8 and the grain loading of filters and dust collectors as provided by the manufacturers.

b. Although the fuel combustion units are direct heat, the best available emission factors are from indirect heat units (e.g., boilers) as published in AP-42, Tables 1.4-1 and 1.4-2, Fifth Edition, Volume I, Supplement D, July 1998. The PM factor is not relevant since the PM from fuel combustion PM cannot be distinguished from process PM and is very small in comparison.

Pollutant	Emission Factor ($lb/mmft^3$)
CO	84
NO_x	100
SO_2	0.6
VOM	5.5

7.2 Unit: Gas-Fired Boilers
Control: None

7.2.1 Description

Boiler No. 1 is the newest boiler as it is a replacement for an original No. 1. It is subject to NSPS and equipped with low NO_x burners. The other two are backup boilers. All three fire on gas only.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
61 (P-49a)	Boiler No. 1, Natural Gas Only. Low NO_x Burners. Firing Rate: 123.9 mmBtu/hr	None
62 (P-77)	Boiler No. 2, Natural Gas Only. Firing Rate: 52.6 mmBtu/hr	None
63 (P-78)	Boiler No. 3, Natural Gas Only. Firing Rate: 38.8 mmBtu/hr	None

7.2.3 Applicability Provisions and Applicable Regulations

a. An "affected boiler" for the purpose of these unit-specific conditions, is a steam generating unit that is fired with natural gas. The affected boilers are identified in Condition 7.2.2.

b. Each affected boiler is subject to the emission limits identified in Condition 5.2.2.

c. Boiler No. 1 is subject to an NSPS, 40 CFR 60 Subpart Db because it is an industrial steam generating unit with a heat input capacity greater than 100 mmBtu/hr. However, since it does not burn coal but combusts only natural gas with a nitrogen content of less than 0.3 weight percent and a heat input capacity of less than 250 mmBtu/hr, it is not subject to the PM emission standard of 40 CFR 60.43b or the NO_x standard of § 60.44b(a)(1). [40 CFR 60.44b(k)]

d. The emission of carbon monoxide (CO) into the atmosphere from the affected boiler shall not exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.2.4 Non-Applicability of Regulations of Concern

a. Each affected boiler is not subject to 35 IAC 217.141, because the actual heat input of the affected boiler is less than 73.2 MW (250 mmBtu/hr).

b. Pursuant to 35 IAC 218.303, each affected boiler, i.e., fuel combustion emission unit, is not subject to 35 IAC 218.301, Use of Organic Material.

c. There are no applicable requirements for particulate matter or sulfur dioxide for affected boilers firing natural gas.

d. Each affected boiler is not subject to 40 CFR 60 Subpart Da for Electrical Utility Generating Units because the steam produced does generate electricity and the heat input is less than the applicable 250 mmBtu/hr rate.

e. Boiler Nos. 2 and 3 are not subject to 40 CFR 60 Subpart Dc for small industrial steam generating units (10 – 100 mmBtu/hr) because they were constructed prior to the applicable date of June 9, 1989.

f. This permit is issued based on the affected Boiler No. 1 not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected boiler uses a passive control measure, such as a combustion or other process design feature or characteristic, that is not considered a control device because it acts to prevent the pollutants from forming. The two other boilers do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.2.5 Operational Requirements

a. The affected boilers shall only be fired by natural gas.

b. i. Annual consumption of natural gas in boiler No. 1 shall not exceed 815,340,000 standard cubic feet (scf).

ii. Annual consumption of natural gas in boiler Nos. 2 and 3 combined shall not exceed 373,900,000 standard cubic feet (scf).

c. At all times the Permittee shall also to the extent practicable maintain and operate Boiler No. 1, including the associate air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions, as required by the NSPS, 40 CFR 60.11(d).

d. The low NO_x burners shall be operated in accordance with manufacturer's recommended operating practices and maintenance requirements.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected Boiler No. 1 is subject to the following:

	Emissions (lb/hr)	(ton/yr)
NO_x	6.2	20.38
CO	11.0	36.20
PM	0.64	2.10
VOM	1.10	3.62

These limits are based on the manufacturer's guaranteed emission rates, an annual fuel consumption limit of 815,340,000 scf, heat content of the natural gas of 1000 Btu/scf, and the rated heat capacity of the boiler of 123.9 mmBtu/hr.

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 99040001, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

7.2.7 Testing Requirements

Upon request by the Illinois EPA, Boiler No. 1 shall be tested to determine compliance with the hourly emission rate in Condition 7.2.6 when firing at maximum rate. The hourly emissions of Condition 7.2.6 were based on an emission rate of 0.05 lb/mmBtu and that rate would also have to be confirmed.

7.2.8 Monitoring Requirements

Since only natural gas with a nitrogen content of less than 0.3 weight percent is combusted in boiler No. 1 and the heat input is less than 250 mmBtu/hr, boiler No. 1 is not subject to an NO_x emission standard and therefore not

required to operate a continuous monitor for NO_x emissions and record the output [40 CFR 60.48b(b)]. However, the source has voluntarily installed such a monitor. The monitor therefore is not required to meet the standards of 40 CFR 60.13 or 60.48b.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Conditions 5.5.1, 7.1.3(c), and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

a. For affected boiler operating day,

i. Calendar date;

ii. Total natural gas usage for the affected boilers (ft^3/day). Units 2 and 3 may be combined;

iii. The calculated average monthly nitrogen oxides emission rate (expressed in lb/month).

Note: Since boiler No. 1 is not subject to a NO_x emission standard under NSPS, it is not subject to the recordkeeping requirements of 40 CFR 60.49b(g).

b. The annual rolling average NO_x, SO_2, CO, PM, and VOM emissions from Boiler No. 1, calculated monthly and calendar annual for the other boilers, with supporting calculations.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected boiler with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probably cause of such deviations, and any corrective actions or preventive measures taken:

a. The Permittee shall submit excess emission reports for any calendar quarter during which there are excess NO_x emissions from the affected boiler. If there are no excess emissions during the calendar quarter, the Permittee shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period. For purpose of this reporting requirement, excess NO_x emissions are define as any calculated 30-day rolling average NO_x emission rate which exceeds the applicable limit of Condition 7.2.6.

b. The Permittee shall promptly notify the Illinois EPA, if the voluntarily installed NO_x monitor does not operate properly for a period of over 7 days.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

a. Compliance with the PM, VOM and CO emission limits in Condition 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

Emissions from the boilers burning natural gas shall be calculated based on the following emission factors:

Pollutant	Emission Factor ($lb/mm\ ft^3$)
PM	7.6
VOM	5.5
CO	84.0
NO_x (Boilers 2 and 3)	100.0

These are the emission factors for uncontrolled natural gas combustion in small boilers (10-100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, updated March 1998.

Boiler Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

b. Compliance with the NO_x standard in Condition 7.2.3(c) for boiler No. 1 is considered to be assured by the inherent nature of operations of low NO_x burners (see Condition 7.2.5(d)) and use of a voluntarily installed continuous monitoring system.

Compliance with the NO_x limitation in Condition 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9, use of a voluntarily installed NO_x continuous emission monitor, and the burner manufacturer's guaranteed NO_x emission rate of 50 $lb/mmft^3$.

Boiler Emissions (lb/hr) = Natural gas consumed ($mmft^3/hr$) times emission factor of 50 $lb/mmft^3$ (lb/mmBtu).

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after October 3, 2002 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

i. Describe the physical or operational change;

ii. Identify the schedule for implementing the physical or operational change;

iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;

e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be

submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and

d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(l), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Allowable Emissions of PM Based on Process Weight Rate

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction and modification commenced after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (b) of 35 IAC 212.321 [35 IAC 212.321(b)].

The emissions of particulate matter into the atmosphere in any one hour period from each of the affected rack cleaners shall not exceed the allowable emission rates specified in the following equation:

$$E = A\ (P)^{B}$$

Where:

P = Process weight rate
E = Allowable emission rate

a. For process weight rates up to 27.2 Mg/hr (450 ton/hr)

	Metric	English
P	Mg/hr	ton/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

[35 IAC 212.321]

b. For process weight rates under 100 lb/hr, the allowable is 0.55 lb/hr. [35 IAC 266.110]

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;

2. Minor Permit Modification; and

3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

    - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and

    - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.

- Are not modifications under any provision of Title I of the CAA;

- Are not required to be processed as a significant permit modification; and

- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

- The source's suggested draft permit/conditions;

- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;

- Applications requesting a relaxation of reporting or recordkeeping requirements; and

- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or

- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or

- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.

Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	**For Illinois EPA use only**
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information

1. Source name:		
2. Source street address:		
3. City:		4. Zip code:
5. Is the source located within city limits?		☐ Yes ☐ No
6. Township name:	7. County:	8. I.D. number:

Owner Information

9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)

14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information

19. Who is the applicant? ☐ Owner ☐ Operator	20. All correspondence to: (check one) ☐ Owner ☐ Operator ☐ Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents

24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	☐ Yes ☐ No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	☐ Yes ☐ No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	☐ Yes ☐ No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	☐ Yes ☐ No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	☐ Yes ☐ No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	☐ Yes ☐ No ☐ Not Applicable, No TRADE SECRET information in this application

Note 1: Answering “No” to any of the above may result in the application being deemed incomplete.

Signature Block

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.

Authorized Signature:

BY:

_____ AUTHORIZED SIGNATURE

_____ TITLE OF SIGNATORY

_____ TYPED OR PRINTED NAME OF SIGNATORY

_____ / _____ / _____ DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source’s CAAPP permit, if necessary.

10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.

2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.

3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.

4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.

5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.

6. Information addressing any outstanding transfer agreement pursuant to the ERMS.

7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.

8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.

9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.html.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

DGP:psj